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*Attorneys for Debtors*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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In re:

DONALD DAVID SEVEY, III and  
AIMEE MICHELLE KNOWLEY-SEVEY,  
  
Debtors.

Case No. 12-21788

Chapter 13

Judge William T. Thurman

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**OBJECTION TO TRUSTEE'S RECOMMENDATION FOR DISMISSAL**

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Debtors, through counsel undersigned, hereby object to the Chapter 7 Trustee's Recommendation for Dismissal and represent as follows:

1. Debtors filed a voluntary Chapter 13 Bankruptcy on February 18, 2012.
2. Debtors filed a Motion to Extend Time to Cure Deficiencies on March 5, 2012, because both Debtors were still trying to gather the necessary documents to cure the deficient filing, and this Court entered an order Granting Debtors' Motion.

3. On March 19, 2012, the Co-Debtor had supplied counsel all necessary documents to cure the deficient filing, but Debtor had not. Debtor was still gathering information necessary to cure the deficient filing.

4. Therefore, Counsel filed a second Motion to Extend Time to Cure Deficiencies on March 19, 2012.

5. The Court again executed an Order Granting Debtors' second Motion. However, where the Motion requested an extension until March 29, 2012, the Court only granted the extension through March 27, 2012.

6. Counsel for Debtors did not notice the Court's change of extension, and assumed that the extension was through the date requested.

7. Because of Counsel's clerical error, Debtors' case was not cured timely.

8. Debtors have now cured the deficient filing, and Debtors attended their first meeting of Creditors.

WHEREFORE, Debtors hereby object to the Trustee's Recommendation for Dismissal, and respectfully request the recommendation be denied, and for any additional relief that the Court may deem just or equitable.

DATED this 23<sup>rd</sup> day of April, 2012.

/s/ Leonard J. Carson  
Leonard J. Carson

**CERTIFICATE OF SERVICE**

I certify that on the 24<sup>th</sup> day of April 2012, the foregoing document was sent via ECF filing and/or first class mail, postage prepaid to the following:

Kevin R. Anderson  
Chapter 13 Trustee  
By ECF

U.S. Trustee  
By ECF

All Creditors on the Attached up to date Mailing Matrix

/s/ Leonard J. Carson  
Leonard J. Carson

Label Matrix for local noticing  
1088-2  
Case 12-21788  
District of Utah  
Salt Lake City  
Mon Apr 23 18:07:04 MDT 2012

American Medical Collection Agency  
PO Box 1235  
Elmsford, NY 10523-0935

Avenues Womens Center, LC  
455 E. South Temple 202  
Salt Lake City, UT 84111-1325

Bonded Adjustment Bureau  
11620 S. State St.  
Suite 1404  
Draper, UT 84020-7124

Cottonwood Hospital Medical Center  
5121 South Cottonwood Street  
Murray, UT 84107-5701

Credit Collection Services  
PO Box 9134  
Needham Heights, MA 02494-9134

Dr. Roy H. Tranwick, MD  
5848 South Fashion Blvd.  
Murray, UT 84107-6121

First Professional Services Corporation  
8841 South Redwood Road  
Suite B  
West Jordan, UT 84088-9290

Halliday & Watkins, PC  
376 East 400 South  
Suite 300  
Salt Lake City, UT 84111-2906

Holladay Pediatrics  
2180 East 4500 South #210  
Salt Lake City, UT 84117-4434

U.S. Bankruptcy Court  
350 South Main #301  
Salt Lake City, UT 84101-2195

Arrow Financial Services  
726 Exchange Street  
Suite 700  
Buffalo, NY 14210-1464

Barclays Bank Delaware  
Attention: Bankruptcy  
Po Box 8801  
Wilmington, DE 19899-8801

Bonneville Billing  
1186 E 4600 S Ste 100  
Ogden, UT 84403-4896

Cottonwood Improvement District  
3620 South Highland Drive  
Sandy, UT 84093

Dr. Christopher J. Jolles MD  
Dept 2078 PO Box 29675  
Phoenix, AZ 85038-9675

Express Recovery Service Inc.  
2790 South Decker Lake Drive  
Salt Lake City, UT 84119-2057

Granite Recovery LLC  
Care of Recovery Management Systems Corp  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Hartford Life BMS: C/O RMS  
77 Hartland St. Suite 401  
P.O. Box 280431  
East Hartford, CT 06128-0431

IHC Health Services  
PO Box 30191  
Salt Lake City, UT 84130-0191

Alta View Hospital  
9660 South 1300 East  
Sandy, UT 84094-3793

Asset Acceptance, LLC  
PO Box 2036  
Warren, MI 48090-2036

Beehive Credit Resolution  
1065 South 500 West  
Suite 202  
Woods Cross, UT 84010-8244

Certegy Payment Recovery Services, Inc.  
3500 5th Street  
Northport, AL 35476-4723

Cottonwood Internal Medicine  
5770 South 250 East  
Suite 335  
Salt Lake City, UT 84107-8111

Dr. Krista M. Schonrock, MD  
5252 South Intermountain Drive  
Murray, UT 84107-5700

Express Recovery Svcs  
2480 South Main Ste 208  
Salt Lake City, UT 84115-3058

HSBC Card Services  
PO Box 60119  
City of Industry, CA 91716-0119

Highland Family Practice  
4460 Highland Dr # 400  
Salt Lake City, UT 84124-3565

Intermountain Central Laboratory  
PO Box 410400  
Salt Lake City, UT 84141-0400

Intermountain Health Care  
PO Box 410400  
Salt Lake City, UT 84141-0400

Intermountain Medical Center  
5121 South Cottonwood Street  
Murray, UT 84107-5701

Intermountain Medical Group  
PO Box 79052  
Phoenix, AZ 85062-9052

J D Clark & Co Inc  
2225 Washington Blvd # 300  
Ogden, UT 84401-6887

Johnson Mark LLC  
PO Box 7811  
Sandy, UT 84091-7811

Knight Adjustment Bureau  
404 East 4500 South  
#A-34  
Salt Lake City, UT 84107-2710

LabCorp  
PO Box 2240  
Burlington, NC 27216-2240

(p)MOUNTAIN AMERICA CREDIT UNION  
735 S STATE ST #300  
SALT LAKE CITY UT 84111-3821

Mountain Land Collections, Inc.  
PO Box 1280  
American Fork, UT 84003-6280

Mountain Medical  
PO Box 29684  
Phoenix, AZ 85038-9684

Mountain Medical Physician Specialists  
PO Box 29684  
Phoenix, AZ 85038-9684

North American Recovery  
5225 Wiley Post Way, Suite 410  
Salt Lake City, UT 84116-2561

Office Recovery Servic  
Po Box 45011  
Salt Lake City, UT 84145-0011

Office of Recovery Services  
515 East 100 South  
SLC, UT 84102-2089

Oral & Maxillofacial Surgery  
3920 South 1100 East  
Suite 160  
Salt Lake City, UT 84124-1213

Pediatric Radiology  
869 East 4500 South  
PMB 511  
Salt Lake City, UT 84107-3049

Primary Childrens Medical Center  
100 N. Mario Capecchi Dr.  
Salt Lake City, UT 84113-1100

Progressive Insurance  
6300 Wilson Mills Road  
Cleveland, OH 44143-2182

RMS  
77 Hartland St. Suite 401  
P.O. Box 280431  
East Hartford, CT 06128-0431

RMS  
77 Hartland Street  
Suite 401  
East Hartford, CT 06108-3253

Revenue Cycle Solution  
2651 Warrenville R  
Downers Grove, IL 60515-5559

Revenue Cycle Solutions, Inc.  
PO Box 7229  
Westchester, IL 60154-7229

Salt Lake City Radiology  
333 South 900 East  
Salt Lake City, UT 84102-2310

Select Portfolio Servicing, Inc.  
1420 South 500 West  
Salt Lake City, UT 84115-5149

SelectHealth  
PO Box 30192  
Salt Lake City, UT 84130-0192

St. Mark's Hospital  
PO Box 99400  
Louisville, KY 40269-0400

TD Auto Finance  
PO Box 9223  
Farmington, MI 48333-9223

The Orthopedic Specialist Hospital  
5848 South Fashion Boulevard  
Salt Lake City, UT 84107-6121

Unified Fire Authority  
3380 South 900 West  
Salt Lake City, UT 84119-4102

United States Trustee  
Ken Garff Bldg.  
405 South Main Street  
Suite 300  
Salt Lake City, UT 84111-3402

University HealthCare  
Po Box 510721  
Salt Lake City, UT 84151-0721

University Pediatric Faculty  
PO Box 26415  
Salt Lake City, UT 84126-0415

Unlimited Auto  
2828 South State Street  
Salt Lake City, UT 84115-3623

Utah Heart Clinic  
3930 Parkway Blvd.  
Salt Lake City, UT 84120-6300

Utah Pathology Service, Inc.  
360 East 4500 South  
Salt Lake City, UT 84107-4297

Vicki L Macy, MD  
455 E. South Temple #202  
Salt Lake City, UT 84111-1325

Aimee Michelle Knowley-Sevey  
8672 South Ida Lane  
Sandy, UT 84093-1422

Donald David Sevey III  
2391 East 6895 South #13  
Salt Lake City, UT 84121-3368

Leonard J. Carson  
Pearson, Butler, Carson & Cook, PLLC  
1682 Reunion Avenue  
Suite 100  
South Jordan, UT 84095-4614

Stephen W. Rupp tr  
170 South Main Street  
Suite 800  
Salt Lake City, UT 84101-1656

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Mountain America Credit Union  
PO Box 9001  
West Jordan, UT 84084

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank National Association, as trustee

(u)Dr. Mark R. Briesacher, MD

(u)LDS Family Services

(u)Salt Lake Laboratory

End of Label Matrix  
Mailable recipients 69  
Bypassed recipients 4  
Total 73